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Attorneys for Plaintiff Trustees of the Northern California General Teamsters Security Fund

UNITED STATES DISTRICT COURT CALIFORNIA
FOR THE EASTERN DISTRICT OF CALIFORNIA
AT SACRAMENTO

TRUSTEES OF THE NORTHERN
CALIFORNIA GENERAL TEAMSTERS
SECURITY FUND,

Plaintiff,

v.

KEOLIS TRANSIT AMERICA, INC.,

Defendant.

Case No. 2:21-CV-00205-MCE-AC

**DECLARATION OF CHRISTOPHER
HAMMER IN SUPPORT OF REQUEST
FOR ENTRY OF DEFAULT BY CLERK**

I, Christopher Hammer, declare as follows:

1. I am an attorney in the law firm of Beeson, Tayer & Bodine, APC, attorneys of record for the Plaintiff in the above-captioned action.

2. On or about February 4, 2021, the Summons, Complaint, and accompanying court documents were served on Defendant, Keolis Transit America, Inc., by means of service on the agent for service of process, Cogency Global, Inc. A true and correct copy of the Proof of Service is attached as Exhibit "A."

3. More than 21 days have elapsed since service was deemed complete upon Defendant.

4. Defendant has failed to answer or otherwise plead in response to Plaintiff's Complaint or to serve a copy of an Answer or pleading upon Plaintiff or me.

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1 5. This Declaration is executed in accordance with Rule 55(a) of the Federal Rules of Civil
2 Procedure for the purpose of enabling Plaintiff to obtain an entry of default against Defendant for
3 Defendant's failure to answer or otherwise defend as to Plaintiff's Complaint.

4 I declare under penalty of perjury under the laws of the State of California that the forgoing is
5 true and correct and of my knowledge, except as to those matters stated herein on information and
6 belief, and as to those matters I believe them to be true. Executed this 3rd day of March 2021 in
7 Sacramento, California.

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9 Dated: March 3, 2021

Respectfully submitted,

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11 By: /s/ Christopher Hammer
CHRISTOPHER HAMMER

12 Attorneys for Trustees of the Northern
13 California General Teamsters Security Fund
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